

U. S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV, ATHENS, GEORGIA

MEMORANDUM

Site:	Medley
Break:	3.10
Other:	

DATE: JAN 29 1991

SUBJECT: Document Review: Draft Remedial Investigation Report of Phase I and Phase II Activities, Medley Farm, Gaffney, South Carolina; ESD Project No. 91E-167

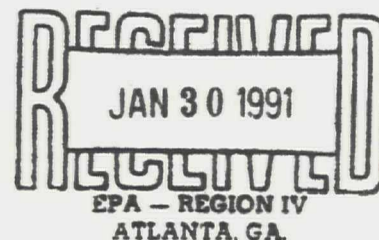
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THRU: William R. Bokey, Chief
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William R. Bokey



The review of the subject document has been completed as requested. Several previous comments were not addressed. Despite the obvious problems that were encountered in the field and laboratory, it appears that the additional wells installed in Phase II have identified various levels of contamination in both the shallow and bedrock wells. However, the extent of contamination has not been defined. Based on the review, the following are comments are offered:

- Section 1.0, p. 2. The Environmental Services Division found several deficiencies in the RI/FS Work Plan in August, 1988 and the RI/FS Project Operations Plan which was developed in January, 1990. Some of the field and laboratory problems that were encountered (see Section 5.10.1, p. 148) may be a result of improper procedures in the "approved" Work Plan and POP.
- Section 1.0, p. 8. The use of published referenced materials for comparison of background levels of contaminants is not an acceptable practice. Since they are not site specific, they do not compare or indicate background levels of contaminants and, therefore, can not be considered acceptable in this document. In the first sentence of the last bullet, "...and with common ranges reported for natural soils" should be removed. This partial sentence occurs several times in the subject document and should also be removed at those occurrences.
- Section 2.1.3, p. 18. The notes at the bottom of Table 2.1 do not agree with the reference numbers.
- Section 2.2.3, p. 28. Why didn't Sirrine collect a water sample from the Sprouse well when they were there measuring the water level?



- Section 2.2.4, p. 30. The reference to the Ralph Medley well is the first time I recall it being mentioned. The document states that it was not sampled and analyzed. Why?
- Section 3.1, p. 39. The correct date for the Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, US-EPA, Region IV, ESD, is: April 1, 1986.
- Section 3.1, p. 39, General Comment: The decontamination procedures for all field equipment should be stated in the appropriate sections of the report.
- Section 3.7.2, p. 71. The grain-size data for the sand pack material that is said to be "included at the back of Appendix E" was not included in this report.
- Section 3.7.4, p. 73. What was the decontamination procedure for the Brainard-Kilman PVC hand pump and the Grundfos stainless steel submersible pump?
- Section 3.9.1, p. 77. All seven wells installed during Phase 1A should have been sampled and analyzed for the TCL/TAL parameters.
- Section 6.2, p. 154. The pesticide "Foxaphene" is misspelled.
- Section 7.0. 159. The extent of contamination has not been defined.

Although water levels may show that the Spouse well is hydraulically upgradient of the Medley Farm site, it could have been impacted by former disposal activities via the surface water route. The Sprouse well should be sampled to confirm the presence or absence of contaminants.

Although the dominant direction of ground water flow appears to be to the southeast, there appears to be some radial flow via possible interconnection of fractures to the northeast as well. Looking at Figures 3.6, 4.5, 5.3, and 6.3 it appears to indicate that (1) the top of the bedrock slopes to the northeast; (2) a lineament is shown to trend in a southwest to northeast direction; and, (3) the levels of contaminants are greater the bedrock well BW-108 than in the shallow well SW-108.

In addition to the above comments that should be addressed, the subject document should be checked for proper reference to the appropriate Figure(s) and Table(s).

If you have any questions or comments, please call FTS 250-3390.

cc: Finger/Wright
Bokey/Hall
Knight